

EXHIBIT 1

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TENNESSEE

PARAGON COMPONENT SYSTEMS, LLC,)	
)	
Plaintiff,)	CIVIL ACTION NO.:
)	1:24-CV-00246-CEA-CHS
v.)	
)	
QUALTIM, INC., et al.,)	DECLARATION OF KIRK
)	GRUNDAHL IN SUPPORT OF
Defendants.)	KIRK GRUNDAHL,
)	QUALTIM, INC., CENTER
)	FOR BUILLDING
)	INNOVATION, LLC,
)	DRJ ENGINEERING, LLC
)	

I, Kirk Grundahl, being duly sworn, hereby affirm as follows:

1. I am over 18 years of age, of sound mind, and otherwise competent to make this Declaration pursuant to 28 U.S.C. § 1746. I have personal knowledge of the matters testified to herein.
2. I am a resident of Wisconsin and reside at 1130 Fairway Court, Lake Mills, Wisconsin, 53551, which is in Jefferson County. I have maintained that residence since 2018 and lived in Wisconsin for 65 out of 68 years.
3. I am a registered professional engineer first licensed in Wisconsin in 1983. I currently hold professional engineering registrations in 47 states. I hold a master's degree in business administration, conferred in 1982, as well.
4. I have never marketed or advertised in Tennessee.
5. I have never had an office in Tennessee.
6. I have never maintained any bank accounts in Tennessee.

7. I have no employees who have traveled to Tennessee to perform any work for Paragon.

8. In 1989, I formed Qualtim Technologies International as a sole proprietorship.

9. In 1999, I incorporated Qualtim, Inc. (“Qualtim”) in the state of Wisconsin, with its principal office in Madison, Wisconsin.

10. I am President of Qualtim. Currently our primary business is testing, engineering, and market development where we aid our customers in bringing their innovative products to market through product certification, quality assurance and specialty engineering. In simple terms, we deploy the testing, engineering and marketing expertise of our staff uniquely.

11. Qualtim is located at two physical offices: 6300 Enterprise Lane, Madison, Wisconsin, 53719 and 4319 Twin Valley Road, Middleton, Wisconsin, 53562. Both of these offices are located in Dane County.

12. Qualtim does not have and has never had an office in Tennessee.

13. None of Qualtim’s shareholders and officers reside in Tennessee.

14. Qualtim is not registered as a foreign entity to do business in Tennessee.

15. Qualtim’s shareholders, officers, and employees have never traveled to Tennessee to perform consulting or professional engineering services for Paragon Component Systems, LLC (“Paragon”).

16. Qualtim’s shareholders and officers have all resided in Wisconsin since 1990.

17. Qualtim has never marketed or advertised in Tennessee.

18. Qualtim has never had an office in Tennessee.

19. Qualtim has never maintained any bank accounts in Tennessee.

20. Qualtim participated in a series of at least four in-person meetings in Wisconsin with Paragon's staff: January 4-5, 2017 (Exhibits 2 & 3, true and correct copies of which are attached – subject to motion to seal to be filed with the Court), September 13-14, 2017 (Exhibit 4, a true and correct copy of which is attached – subject to motion to seal to be filed with the Court), May 29-30, 2018 (Exhibit 5, a true and correct copy of which is attached – subject to motion to seal to be filed with the Court), July 12-13, 2023 (a face-to-face strategic planning meeting on July 12 and a visit to Wausau Homes on July 13), and August 7-11, 2023 (Exhibits 6, 7 & 8, true and correct copies of which are attached – subject to motion to seal to be filed with the Court, & Exhibit 9, a true and correct copy of which is attached.)

21. Prior to Dan Holland's formation of Paragon in 2016 and the formation of Inspired Pursuits, LLC in 2017, original intellectual property development, engineering software, and manufacturing software formative work took place between Qualtim and Clearspan Components, Inc., starting in 2009 at a shared 50/50 cost. (Exhibits 10 & 11, true and correct copies of which are attached – subject to motion to seal to be filed with the Court.)

22. The Center for Building Innovation, LLC ("CBI") was formed in 2020 in the state of Wisconsin, for the purpose of providing an ISO/IEC 17025 accredited testing facility and ISO/IEC 17020 third party inspection agency.

23. CBI is not registered as a foreign entity to do business in Tennessee.

24. From 2020 to June of 2024, CBI conducted its business at a single office: 6300 Enterprise Lane, Madison, Wisconsin 53719. In June of 2024, a second facility was purchased to expand the CBI business.

25. CBI currently has two physical offices in Wisconsin: 6300 Enterprise Lane, Madison, Wisconsin 53719 and 4319 Twin Valley Road, Middleton, Wisconsin 53562.

26. CBI has never had any offices or employees in Tennessee.

27. I am the professional engineering manager of CBI.

28. None of CBI's shareholders and officers have ever resided in Tennessee.

29. None of CBI's shareholders, officers, and employees have ever traveled to Tennessee to perform services for Paragon or any other entity.

30. CBI's members reside in Wisconsin.

31. CBI has never marketed or advertised in Tennessee.

32. CBI has never had an office in Tennessee.

33. CBI has never maintained any bank accounts in Tennessee.

34. Paragon staff toured CBI and its predecessor SBCRI in at least four physical meetings in Wisconsin: January 4-5, 2017 (Exhibits 2 & 3), September 13-14, 2017 (Exhibit 4), May 29-30, 2018 (Exhibit 5), and August 7-11, 2023 (Exhibits 6, 7, 8, 9). No physical meetings took place in Tennessee.

35. DrJ Engineering, LLC (DrJ) was established in 2011 as an engineering company to undertake professional engineering and ISO/IEC 17065 accreditation for product certification.

36. I am the sole owner and president of DrJ.

37. DrJ is located in Wisconsin with two physical offices: 6300 Enterprise Lane, Madison, Wisconsin 53719 and 4319 Twin Valley Road, Middleton, Wisconsin 53562.

38. DrJ has no physical offices in Tennessee.

39. All of DrJ's professional engineering staff reside and perform their work in Madison, Wisconsin and Jacksonville, Florida.

40. Professional engineering regulations often require engineering companies to register as foreign entities to transact engineering business in individual states. Thus, DrJ

Engineering is licensed in 48 states, including Tennessee, for the purpose of providing sealed engineering for its engineering work, such as, but not limited to, truss design drawings.

41. DrJ did not perform any professional engineering services for Paragon, within any Tennessee location.

42. As DrJ's sole owner and President, I have resided in Wisconsin since 1989.

43. DrJ has never marketed or advertised in Tennessee.

44. DrJ has never had an office in Tennessee.

45. DrJ has never maintained any bank accounts in Tennessee.

46. DrJ participated in at least four in-person meetings in Wisconsin with Paragon staff: January 4-5, 2017 (Exhibit 2, 3), September 13-14, 2017 (Exhibit 4), May 29-30, 2018 (Exhibit 5), and August 7-11, 2023 (Exhibits 6, 7, 8, 9).

47. I have known Daniel Holland since 1999, and until his untimely death on January 17, 2024.

48. Suzi Grundahl, Daniel Holland and I began collaborating with respect to the structural building component engineering and manufacturing market segment beginning in 1999.

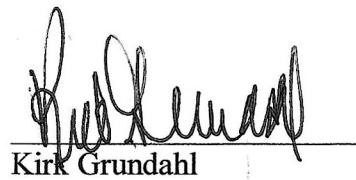
49. In 2009, Suzi Grundahl, Daniel Holland and I realized there was an opportunity to use the unique knowledge each of us had to develop trade secrets, create new intellectual property, and deploy all of this via the engineering, manufacturing and sale of all manner of engineered structural building components, including the development of software to support these initiatives. This was the vision of Inspired Pursuits, LLC. (See Exhibits 12, 13, 14, true and correct copies of which are attached – subject to motion to seal to be filed with the Court.)

50. Referenced exhibits contain confidential trade secret information being transformed into intellectual property, where any of this provided into the public domain will do

great harm to the vision, mission, competitive standing, and long-term business value of Inspired Pursuits, LLC.

FURTHER AFFIANT SAYETH NOT.

Executed on October 1, 2024.



Kirk Grundahl